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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTIAN NAVARRETE-BANUELOS,  
aka, "Christian Damian Navarrete Banuelos,"  
Defendant.

Case No. 2:21-cr-00298-GMN-EJY

**Stipulation for an Order  
Directing Probation to Prepare  
a Criminal History Report**

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, and Jared L. Grimmer, Assistant United States Attorney, counsel for the United States of America, and Aden Kebede, Assistant Federal Public Defender, counsel for Defendant CHRISTIAN NAVARRETE-BANUELOS, that the Court direct the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

This stipulation is entered into for the following reasons:

1. The United States Attorney's Office has developed an early disposition program for immigration cases, authorized by the Attorney General pursuant to the PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has

1 extended to the defendant a plea offer in which the parties would agree to jointly request an  
2 expedited sentencing immediately after the defendant enters a guilty plea.

3 2. The U.S. Probation Office cannot begin obtaining the defendant's criminal  
4 history until after the defendant enters his guilty plea unless the Court enters an order  
5 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of  
6 a defendant's initial appearance when charged by indictment.

7 3. The U.S. Probation Office informs the government that it would like to begin  
8 obtaining the criminal history of defendants eligible for the early disposition program as  
9 soon as possible after their initial appearance so that the Probation Office can complete the  
10 Presentence Investigation Report by the time of the expected expedited sentencing.

11 4. Accordingly, the parties request that the Court enter an order directing the  
12 U.S. Probation Office to prepare a report detailing the defendant's criminal history.

13 DATED this 23rd day of November, 2021.

14 Respectfully Submitted,

15 RENE L. VALLADARES  
16 Federal Public Defender

CHRISTOPHER CHIOU  
Acting United States Attorney

17 /s/ Aden Kebede  
18 ADEN KEBEDE  
19 Assistant Federal Public Defender  
20 Counsel for Defendant CHRISTIAN  
21 NAVARRETE-BANUELOS

/s/ Jared L. Grimmer  
JARED L. GRIMMER  
Assistant United States Attorney

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**Order Directing Probation to  
Prepare a Criminal History Report  
[Proposed]**

Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served:

IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history.

**IT IS SO ORDERED.**

Dated this 29 day of November, 2021

  
\_\_\_\_\_  
Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT